

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JENNIFER DOLD, personal representative of the estate of Alexander Dold; and KATHY DUNCAN, mother of Alexander Dold,

Plaintiffs.

VS.

SNOHOMISH COUNTY, a political subdivision of the State of Washington; BRYSON McGEE; and CODY MCCOY,

Defendants

NO. 2:20-cv-00383-RAJ

DEFENDANTS' JOINT MOTION FOR
WITHDRAWAL AND
SUBSTITUTION OF COUNSEL FOR
DEFENDANTS SNOHOMISH
COUNTY AND BRYSON McGEE

**NOTE ON MOTION CALENDAR:
February 26, 2021**

The Snohomish County Prosecuting Attorney's Office respectfully requests to withdraw from the representation of both Defendant Snohomish County and Defendant Bryson McGee in this matter due to the development of a potential conflict of interest between the County and Defendant McGee, pursuant to LCR 83.2(b).

The County respectfully requests the Court permit Ted Buck of Frey Buck P.S. to appear and substitute in as counsel for Defendant Snohomish County. Shannon Ragonesi of Keating Bucklin & McCormack, Inc. P.S., who currently represents Defendant Cody McCoy in this case, respectfully requests to substitute in as counsel for Defendant Bryson McGee. Both Defendant McCoy and Defendant McGee have consented to the joint representation by

DEFENDANTS' JOINT MOTION FOR WITHDRAWAL AND
SUBSTITUTION OF COUNSEL FOR DEFENDANTS SNOHOMISH COUNTY
AND BRYSON McGEE - 1
(C20-383-RAJ)

**Snohomish County
Prosecuting Attorney – Civil Division
Robert Drewel Bldg., 7th Floor, M/S 504
3000 Rockefeller Ave
Everett, Washington 98201-4060
(425)388-6330 Fax: (425)388-6333**

1 Ms. Ragonesi and have signed a written consent letter, which will be made available to the
2 Court to review *in camera* upon the Court's request.

3 The undersigned counsel for Snohomish County certifies that he discussed this
4 motion with counsel for Plaintiffs by telephone. Counsel for Plaintiffs indicated he does not
5 oppose the withdrawal of the Prosecuting Attorney's Office from the representation of both
6 Snohomish County and Bryson McGee or the substitution of Ted Buck as counsel for
7 Defendant Snohomish County, but he does object to the substitution of Ms. Ragonesi as
8 counsel for Defendant McGee. Lacking agreement on the substitution, counsel for the County
9 and substituting counsel for Defendant McGee bring this motion. Counsel further certifies
10 that this motion is also being served on Defendants Snohomish County and Bryson McGee.

12
13 RESPECTFULLY SUBMITTED this 11th day of February, 2021.

14 ADAM CORNELL
15 Snohomish County Prosecuting Attorney

16 By: s/ Geoffrey A. Enns
17 GEOFFREY A. ENNS, WSBA #40682
18 Deputy Prosecuting Attorney
19 Attorney for Defendants Snohomish
20 County and Bryson McGee
21 3000 Rockefeller Ave., M/S 504
22 Everett, WA 98201
23 Geoffrey.Enns@co.snohomish.wa.us

24 KEATING BUCKLIN & McCORMACK, INC., P.S.

25 By: s/ Shannon Ragonesi
26 SHANNON RAGONESI, WSBA #31951
27 Attorney for Defendant Cody McCoy
28 801 Second Ave., Suite 1210
29 Seattle, WA 98104
30 sragonesi@kbmlawyers.com

DECLARATION OF SERVICE

I declare that I am an employee of the Civil Division of the Snohomish County Prosecuting Attorney, and that on this day, I caused to be delivered foregoing document(s) on the following parties by the methods indicated:

James E. Lobsenz
Carney Badley Spellman, P.S.
701 Fifth Avenue, Suite 3600
Seattle, WA 98104-7010
lobsenz@carneylaw.com

*Attorney for Plaintiffs Jennifer Dold, P.R.
for the Estate of Alexander Dold; and
Kathy Duncan*

- Electronic Filing (CM/ECF)
- E-Mailed:
- Facsimile:
- U.S. Mail, 1st Class
- Hand Delivery
- Messenger Service

Shannon M. Ragonesi
Keating Buckling McCormack, Inc., P.S.
801 Second Avenue, Suite 1210
Seattle, WA 98104
Attorney for Defendant Cody McCoy

- Electronic Filing (CM/ECF)
- E-Mailed:
- Facsimile:
- U.S. Mail, 1st Class
- Hand Delivery
- Messenger Service

I certify under penalty of perjury under the laws of the state of Washington that the foregoing information is true and correct.

DATED this 11th day of February, 2021.

2021. Cindy Ryden
Cindy Ryden, Legal Assistant

DEFENDANTS' JOINT MOTION FOR WITHDRAWAL AND
SUBSTITUTION OF COUNSEL FOR DEFENDANTS SNOHOMISH COUNTY
AND BRYSON McGEE - 3
(C20-383-RAJ)

**Snohomish County
Prosecuting Attorney – Civil Division
Robert Drewel Bldg., 7th Floor, M/S 504
3000 Rockefeller Ave
Everett, Washington 98201-4060
(425)388-6330 Fax: (425)388-6333**